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GREGORY R. TAN, ESQ.
Admitted Pro Hac Vice
GREENBERG TRAURIG, LLP
1144 15th Street, Suite 3300
Denver, Colorado 80202
Telephone: (303) 572-6500
Email: *tangr@gtlaw.com*
Counsel for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

ROBERT SINGER,

Plaintiff,

v.

C. R. BARD, INCORPORATED and BARD
PERIPHERAL VASCULAR,
INCORPORATED,

Defendants.

CASE NO. 2:19-CV-01579-JCM-BNW

**ERRATA TO VERIFIED PETITION
FOR PERMISSION TO PRACTICE IN
THIS CASE ONLY BY ATTORNEY
NOT ADMITTED TO THE BAR OF
THIS COURT AND DESIGNATION OF
LOCAL COUNSEL
(GREGORY R. TAN)**

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively “Defendants” or “Bard”) respectfully request this Court to accept this Errata to the Verified Petition for Permission to Practice in This Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel submitted by Gregory R. Tan, of the law firm Greenberg Traurig LLP and located in Denver, Colorado, as counsel for Defendants. Mr. Tan filed his petition to practice *pro hac vice* (“Petition”) on October 4, 2019. [Dkt. 12.] The Court granted the Petition on October 9, 2019. [Dkt. 14.] Defendants respectfully

1 request this Court to replace the Petition originally filed with the Court with the corrected
2 *pro hac vice* petition attached to this Errata as Attachment 1. The revisions to the Petition
3 include Exhibits B and C to Attachment 1.

4 This motion is necessary to comply with Local Rule 1A 11-2.

5 DATED this 6th day of March 2020.

6 GREENBERG TRAURIG, LLP

7 By: /s/ *Eric W. Swanis*

8 ERIC W. SWANIS, ESQ.

9 Nevada Bar No. 6840

10 10845 Griffith Peak Drive, Suite 600

11 Las Vegas, Nevada 89135

12 GREGORY R. TAN, ESQ.

13 *Admitted Pro Hac Vice*

14 GREENBERG TRAURIG, LLP

15 1144 15th Street, Suite 3300

16 Denver, Colorado 80202

17 Telephone: (303) 572-6500

18 *Counsel for Defendants*

CERTIFICATE OF SERVICE

I hereby certify that on **March 6, 2020**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ Evelyn Escobar-Gaddi

An employee of GREENBERG TRAURIG, LLP

ATTACHMENT 1

Case #2:19-cv-01579-JCM-VCF

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

FILING FEE IS \$250.00

C. R. BARD, INCORPORATED and
BARD PERIPHERAL VASCULAR,
INCORPORATED,
Defendant(s).

Petitioner, respectfully represents to the Court:

Greenberg Traurig, LLP

with offices at 1144 15th Street, Suite 3300

80202

(zip code)

tangr@gtlaw.com

(Email address)

C. R. Bard, Inc., Bard Peripheral Vascular, Inc. to provide legal representation in connection with
[client(s)]

Rev. 5/16

3. That since June 12, 2007, Petitioner has been and presently is a
 (date)
 member in good standing of the bar of the highest Court of the State of Colorado
 (state)
 where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or
 from the clerk of the supreme court or highest admitting court of each state, territory, or insular
 possession of the United States in which the applicant has been admitted to practice law certifying
 the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District
 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts
 of other States on the dates indicated for each, and that Petitioner is presently a member in good
 standing of the bars of said Courts.

Court	Date Admitted	Bar Number
U.S. District Court for the N. District of Georgia	March 18, 2002	
U.S. District Court for the District of Colorado	March 17, 2009	
U.S. Court of Appeals for the Tenth Circuit	February 24, 2016	
U.S. Court of Appeals for the Ninth Circuit	September 15, 2016	
State of Georgia	December 21, 1998	697268
State of Colorado	June 12, 2007	38770

5. That there are or have been no disciplinary proceedings instituted against petitioner,
 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory
 or administrative body, or any resignation or termination in order to avoid disciplinary or
 disbarment proceedings, except as described in detail below:

None

6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

No

7. That Petitioner is a member of good standing in the following Bar Associations.

Georgia Bar Association
Colorado Bar Association
American Bar Association

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
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~~None~~

See Exhibit B and Exhibit C attached hereto.

(If necessary, please attach a statement of additional applications)

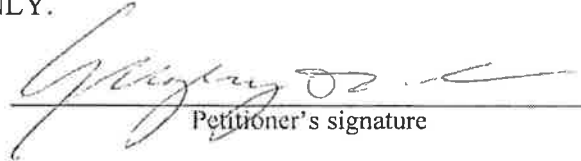
9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

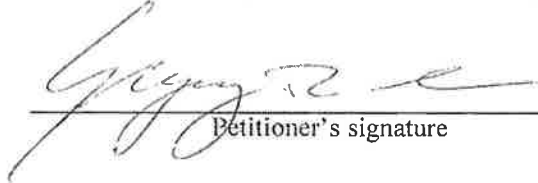
1 That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
 2 FOR THE PURPOSES OF THIS CASE ONLY.

3
 4 STATE OF Colorado)
 5 COUNTY OF Denver)
 6

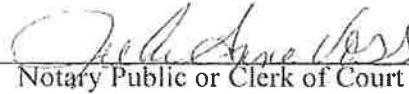

 Petitioner's signature

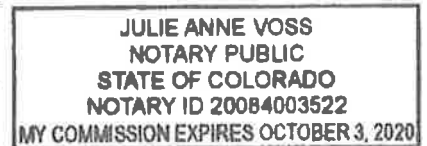
7 Gregory R. Tan, Petitioner, being first duly sworn, deposes and says:
 8 That the foregoing statements are true.

9
 10 Subscribed and sworn to before me this


 Petitioner's signature

11 27th day of September, 2019.

12
 13 
 Notary Public or Clerk of Court



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 15
 16 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO**
 17 **THE BAR OF THIS COURT AND CONSENT THERETO.**

18 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
 19 believes it to be in the best interests of the client(s) to designate Eric W. Swanis,
 (name of local counsel)
 20 Attorney at Law, member of the State of Nevada and previously admitted to practice before the
 21 above-entitled Court as associate resident counsel in this action. The address and email address of
 22 said designated Nevada counsel is:

23 Greenberg Traurig, LLP, 10845 Griffith Peak Drive, Suite 600,
 (street address)
 24 Las Vegas, Nevada, 89135,
 (city) (state) (zip code)
 25 702-792-3773, swanise@gtlaw.com,
 (area code + telephone number) (Email address)
 26
 27
 28

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.
4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6
7 The undersigned party(ies) appoint(s) Eric W. Swanis as
8 his/her/their Designated Resident Nevada Counsel in this case.
9
10

11 /s/ Greg A. Dadika
12 (party's signature)

13 Greg A. Dadika, Associate General Counsel, Litigation
14 (type or print party name, title)

15
16 (party's signature)

17
18 (type or print party name, title)

19 **CONSENT OF DESIGNEE**

20 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

21 
22 Designated Resident Nevada Counsel's signature

23 6840

24 Bar number

25 swanise@gtlaw.com

26 Email address

27 APPROVED:

28 Dated: this 18th day of March, 2020.


UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on **October 4, 2019**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service, and I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participants:

Peter C. Wetherall, Esq.
Nevada Bar No. 4414
pwetherall@wetherallgroup.com
WETHERALL GROUP, LTD.
9345 W. Sunset Road, Suite 100
Las Vegas, Nevada 89148
Telephone: (702) 838-8500
Facsimile: (702) 837-5081
Counsel for Plaintiff

/s/ Evelyn Escobar-Gaddi
An employee of GREENBERG
TRAURIG, LLP

GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive
Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

EXHIBIT A



Certificate of Good Standing and No Disciplinary History

United States District Court
District of Colorado

I, Jeffrey P. Colwell, Clerk of the United States District Court
DO HEREBY CERTIFY

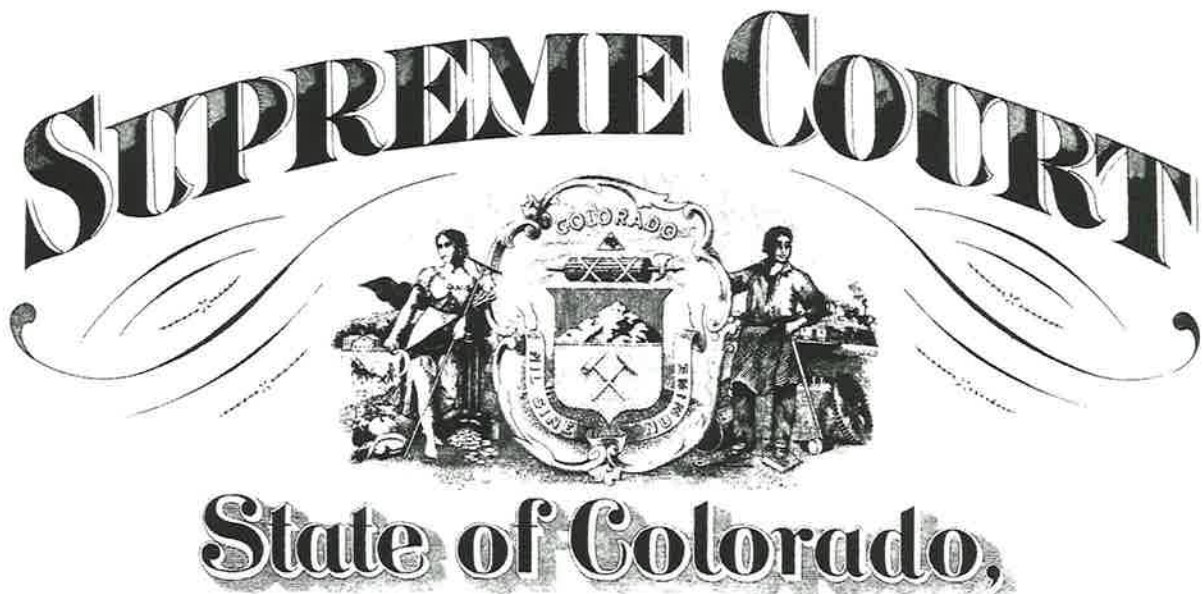
GREGORY RUDOLPH TAN

was admitted to practice in this court on
March 17, 2009
and is in good standing with no disciplinary history.

Dated: September 23, 2019

A handwritten signature in cursive script that reads "Jeffrey P. Colwell".

Jeffrey P. Colwell, Clerk



STATE OF COLORADO, ss:

I, Cheryl Stevens Clerk of the Supreme Court of the State of Colorado, do hereby certify that

Gregory Rudolf Tan

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of Attorneys and Counselors at Law in my office of date the 12th

day of June A. ~~2007~~ and that at the date hereof the said Gregory Rudolf Tan

is in good standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

27th day of September A. D. 2019

Cheryl Stevens

Clerk

By

Jacqueline Patten

Deputy Clerk



State Bar of Georgia

Lawyers Serving the Public and the Justice System

Mr. Gregory Rudolf Tan
Greenberg Traurig LLP
1144 15th Street Suite 3300
Denver, CO 80202

CURRENT STATUS:	Inactive Member-Good Standing
DATE OF ADMISSION:	12/21/1998
BAR NUMBER:	697268
TODAY'S DATE:	09/30/2019

The prerequisites for practicing law in the State of Georgia are as follows:

- Certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, highest court required to practice law in Georgia.
- Enrolled with the State Bar of Georgia, administrative arm of the Supreme Court of Georgia.

This member is currently in “good standing” as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

STATE BAR OF GEORGIA

Brinda Lovvorn

Official Representative of the State Bar of Georgia



HEADQUARTERS

104 Marietta St. NW, Suite 100
Atlanta, GA 30303-2743
404-527-8700 • 800-334-6865
Fax 404-527-8717
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COASTAL GEORGIA OFFICE

18 E. Bay St.
Savannah, GA 31401-1225
912-239-9910 • 877-239-9910
Fax 912-239-9970

SOUTH GEORGIA OFFICE

244 E. 2nd St. (31794)
P.O. Box 1390
Tifton, GA 31793-1390
229-387-0446 • 800-330-0446
Fax 229-382-7435

EXHIBIT B

EXHIBIT B

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

Gregory R. Tan's Concurrently Filed

Petitions for Permission to Practice in This Case Only by

Attorney Not Admitted to the Bar of This Court

CASE NAME/STATUS	CASE #	DATE FILED/GRANTED [DKT. NO.]
Giambra v. C. R. Bard, Inc., et al./ Active	2:19-cv-01580-APG-BNW	Filed 10/4/19 [17]; Granted 10/7/19 [19]
Hammes v. C. R. Bard, Inc., et al./ Stipulation for Dismissal Pending	2:19-cv-01588-RFB -BNW	Filed 10/4/19 [16]; Granted 10/9/19 [18]
Perry v. C. R. Bard, Inc., et al./ Active	2:19-cv-01570-APG-BNW	Filed 10/4/19 [16]; Granted 10/7/19 [17]
Rogers v. C. R. Bard, Inc., et al./ Active	2:19-cv-01581-APG-BNW	Filed 10/4/19 [15]; Granted 10/7/19 [16]
Singer v. C. R. Bard, Inc., et al./ Active	2:19-cv-01579-JCM-BNW	Filed 10/4/19 [12]; Granted 10/9/19 [14]
Smith v. C. R. Bard, Inc., et al./ Stipulation for Dismissal Pending	2:19-cv-01576-RFB-BNW	Filed 10/4/19 [14]; Granted 10/31/19 [19]
Torres v. C. R. Bard, Inc., et al./ Active	2:19-cv-01582-KJD-BNW	Filed 10/4/19 [15]; Granted 11/13/19 [20]

EXHIBIT C

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EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

ROBERT SINGER,

Plaintiff,

v.

C. R. BARD, INCORPORATED and BARD
PERIPHERAL VASCULAR,
INCORPORATED,

Defendants.

CASE NO. 2:19-cv-01579-JCM-BNW

**AFFIDAVIT IN SUPPORT OF
VERIFIED PETITION FOR
PERMISSION TO PRACTICE IN THIS
CASE ONLY BY ATTORNEY NOT
ADMITTED TO THE BAR OF THIS
COURT AND DESIGNATION OF
LOCAL COUNSEL**

STATE OF COLORADO)

)

)

)

)

COUNTY OF DENVER)

ss:

I, GREGORY R. TAN, being first duly sworn upon my oath, depose and state as follows:

1. I file this Affidavit pursuant to Local Rule IA 11-2(h)(2). I am an attorney with the law firm of Greenberg Traurig, LLP ("GT"). GT was retained by Defendants. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Defendants" or "Bard") to provide them legal representation for the many cases remanded to this District, and hundreds of others remanded in other states, from the Multi-District Litigation proceeding styled *In re: Bard IVC Filter Litigation*, No. 2:15-MD-02641-DGC, pending before Senior Judge David Campbell of the District of Arizona (the "MDL").

To date, there have been two rounds of remands from the District of Arizona MDL to the District of Nevada. In the first round of remands on August 20, 2019, fourteen (14) cases were remanded to this District. In the second round of remands on October 17, 2019, ten (10)

1 cases were remanded to this District. The above-captioned case was in the second-round of
2 remands to this District. *See Suggestion of Remand and Transfer Order* (Dkt. 3.) More
3 remands are expected in the future.

4 2. I am a member in good standing of the State Bar of Colorado, where I regularly
5 practice law. I am also a member in good standing of the State Bar of Georgia and admitted
6 to practice before the United States District Courts for the District of Colorado and the
7 Northern District of Georgia, and the Ninth and Tenth U.S. Circuit Courts of Appeal. *See*
8 *Verified Petition*, No. 4.

9 3. I am co-counsel in this action and several of the other MDL remands to this
10 Court with Eric W. Swanis, who is a member of the State Bar of Nevada and a GT shareholder
11 who resides and practices law in Nevada. *See Verified Petition* (Attachment 1).

12 4. Due to the number and timing of these remands, I inadvertently neglected to
13 identify in No. 8 of my *Verified Petition* the other MDL remand cases in which I had
14 previously or simultaneously filed applications to practice *pro hac vice* before this Court. I
15 have now corrected the *Verified Petition* to identify all actions in which I have filed
16 applications to appear as counsel under Local Rule IA 11-2(b)(7) during the past three years.
17 *See Exhibit B to Verified Petition*.

18 5. My firm has extensive experience in medical device products liability actions
19 and represents Bard in remands of IVC filter litigation across the country. I also have had
20 extensive interactions with client representatives concerning the facts underlying this matter
21 and am familiar with the facts and client-specific legal strategies pertinent to this litigation.

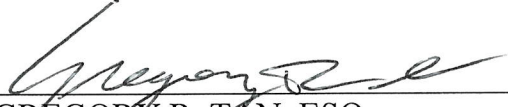
22 6. The granting of my *Verified Petition* serves the ends of justice by ensuring that
23 the interests of Bard are thoroughly represented by the persons most knowledgeable about the
24 litigation.

25 7. I therefore submit this Affidavit to establish special circumstances and good
26 cause to permit Bard to be defended in this matter by its counsel of choice. In my judgment,
27 Bard would be deprived of these benefits if I were unable to represent it in this litigation.
28

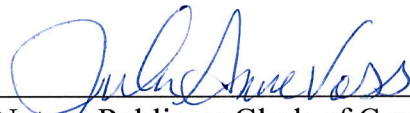
1 8. For all foregoing reasons, there are special circumstances and good cause that warrant
2 the granting of my Verified Petition.

3 FURTHER YOUR AFFIANT SAYETH NAUGHT.

4 DATED this 3RD day of March, 2020.

5 
6 GREGORY R. TAN, ESQ.

7 SUBSCRIBED AND SWORN to before me this
8 3RD day of March, 2020.

9 
10 _____
11 Notary Public or Clerk of Court

